

**Amendments to the Drawings:**

The attached replacement drawing sheets makes changes to Fig. 5 and replaces the original sheet with Fig. 5.

Attachment: Replacement Sheet

**REMARKS**

Claims 1 and 4-8 are pending in this application. By this Amendment, claims 1, 4 and 5 are amended, and claims 2 and 3 are canceled. In particular, claim 1 is amended to include the features recited in original claims 2 and 3, and claims 4 and 5 are amended to change their dependency. In view of the following remarks, reconsideration and allowance are respectfully requested.

**I. Objection to the Drawings**

The drawings are objected to for failing to designate prior art. The attached replacement sheet overcomes the rejection. Withdrawal of the objection is respectfully requested.

**II. Objection to the Specification**

The disclosure is objected to because of various informalities. The disclosure has been amended to overcome the objection. Withdrawal of the objection is respectfully requested.

**III. Rejection of the Claims under 35 U.S.C. §102(b)**

Claims 1-8 are rejected under 35 U.S.C. §102(b) over Muller (U.S. Patent No. 3,100,383) or Taylor (U.S. Patent No. 3,279,195) or Glass et al. (U.S. Patent No. 5,407,304). This rejection is respectfully traversed.

Applicants submit that Taylor, Glass and Muller fail to disclose all of the features recited in independent claim 1. In particular, the applied references fail to disclose a grasping mechanism that grasps each end portion of the two Z profile sheet piles, each grasping end portion being on an opposite side of the clutches at which the two Z profile sheet piles are joined each other, individually.

Taylor discloses a piston rod (13) adapted to be connected to a separate pile, each piston rod having a fork connector (14) which is adapted to be coupled by means of a pin to a

pile plate (16) which is bolted to the pile. The pile plate of each pile is located at a top portion of each pile. An interconnecting leg of each pile is adjacent to the pile plate (16). See, for example figure 8. Accordingly, the piston rods (13) are connected to two pile plates (16) which are adjacent to the interconnecting legs, and not at opposite sides of the interconnecting legs. Thus, Taylor fails to disclose a press-in apparatus that is equivalent to press-in apparatus recited in independent claim 1.

Regarding Glass, as shown in Figure 3, pile 10 and pile 12 are grasped at end portions which are adjacent to each other, as opposed to each pile being grasped at opposite sides of the clutches. Accordingly, Glass fails disclose a press-in apparatus that is equivalent to press-in apparatus recited in independent claim 1.

Furthermore, Taylor and Glass fail to disclose pressing two Z profile sheet piles in at a time in a state where the two Z profile sheet piles are joined each other at clutches thereof. In other words, Taylor and Glass fail to disclose pressing two sheet piles in simultaneously. Rather, Glass discloses driving a first pile into the ground and then subsequently vertically aligning an undriven raised pile with the adjacent driven pile for subsequent threading or stabbing to form the interlocking relation. In this respect, the two piles are driven in at separate times, as opposed to being driven in at the same time. See, for example, column 4, lines 46-68 and column 5, lines 1-25. Regarding Taylor, Taylor discloses that a group of piles may be driven, however, Taylor does not disclose that the group of piles are driven simultaneously.

Muller discloses a coupling device designed for clamping two pile sheets together. The device comprises two supports 4a and 4b formed with internal downwardly tapered guide surfaces 6b and 6b' to define a space within which a pair of clamping jaws 7b and 7b' are fitted. As shown in figures 1, 5, 6 and 7, the clamping jaws grasp the pile sheets 8a and 8b at the top of each sheet, as opposed to each pile being grasped at opposite sides of the linking

interfaces of each pile. Thus, the grasping mechanism of Muller is not equivalent to the grasping mechanism recited in independent claim 1. Accordingly, Muller fails to disclose all of the features recited in independent claim 1.

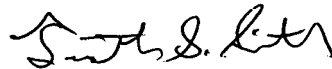
Because Taylor, Glass and Muller fail to disclose all of the features recited in independent claim 1, withdrawal of the rejection is respectfully requested.

**IV. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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